

## **REMARKS**

In the Office Action mailed June 17, 2005, claims 1-7, 10-16, 19-22 and 25-28 were rejected under 35 U.S.C. § 102(e), and claims 8-9, 17-18 and 23-24 were rejected under 35 U.S.C. § 103(a).

As set forth, Applicants have amended claims 1, 3 and 21, canceled claims 2, 4-8, 11-20, 22 and 27, and added claim 29. Applicants traverse the rejections of the claims and respectfully request reconsideration.

### **Rejection of Claims 1-7, 10-16, 19-22 and 25-28 under 35 U.S.C. § 102(e)**

Claims 1-7, 10-16, 19-22 and 25-28 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0203855 to Veerasamy. To anticipate a claim, every element set forth in the claim must be found in a single reference. (MPEP § 2131). Further, “[t]he identical invention must be shown in as complete detail as contained in the ... claims.” (MPEP § 2131). Applicants submit that Veerasamy does not teach the identical invention is as complete detail as is recited in claims 1, 21, 28 and added claim 29. For example, each of claims 1, 21, 28 and 29 recite a base station detecting a call drop. Veerasamy fails to teach this claim limitation.

Veerasamy teaches an apparatus for reporting call drop location information associated with a mobile station to a server coupled to the wireless network. The apparatus resides within the mobile station. (Abstract). Veerasamy describes that the mobile station is specially-equipped with a Global Positioning System (GPS) device that enables the mobile station to determine its position in the event that a call is dropped or service is dropped. (¶0034). Then, when service is restored, the mobile station relays the GPS position of the call drop to a network

server. (¶0035). Thus, Veerasamy describes a handset-based mechanism (in contrast to a network-based mechanism) for detecting a call drop and determining the call drop location.

Each of claims 1, 21, 28 and 29 recite a base station detecting a call drop, and responsively causing position determining equipment (PDE) to determine a call-drop location of the mobile station. The base station is a network entity, and is not a device that is located or positioned within a mobile station.

Veerasamy does not teach a base station detecting a call-drop, as in the present claims. Nevertheless, the Examiner asserted that Veerasamy discloses “wherein making the determination that the call in which the mobile station was engaged has been dropped comprises the base station determining that the call cannot be handed off to another cell-site (page 3, paragraph 33, drop, it is inherent that when a call is dropped handoff can not take place).” (Office Action, p. 4). However, Veerasamy does not teach determining that a call is dropped when the call cannot be handed off. The cited section in Veerasamy describes that when a link between a base station and a mobile station falls below a predetermined signal strength threshold, the mobile station will drop the link and seamlessly transfer to another base station. Thus, this section teaches traditional call handoff between base stations. The call is never dropped, but rather continues via communication with a different base station. Veerasamy does not teach a base station that determines a call-drop of the mobile station and responsively determines a call-drop location of the mobile station, as in the present claims.

In addition, claim 1 has been amended to recite “wherein determining the call-drop location comprises the base station sending a position request to the PDE to determine the location of the mobile station, the position request including a mobile identification number (MIN) identifying the mobile station.” Since Veerasamy teaches that the mobile station

determines the call-drop location, Veerasamy does not teach sending a position request to a PDE to determine the location of a mobile station, as in claim 1.

Furthermore, Claim 29 has been added and recites a system comprising a network entity communicatively coupled to the mobile station and arranged to “responsively cause position determining equipment (PDE) to determine a call-drop location of the mobile station by: sending a location request to a mobile switching center (MSC), the location request including an ID identifying the mobile station; the MSC sending a position request to a mobile positioning center (MPC); the MPC forwarding the position request to the PDE; and the PDE responsively determining the location of the mobile station.” Claim 29 is fully supported by the specification as originally filed at pages 15-16. Veerasamy does not teach steps executed by a base station as recited in claim 29.

Since Veerasamy does not teach each claim limitation of any of claims 1, 21 and 28, Veerasamy does not anticipate pending claims 1, 3, 10, 21, 25-26 and 28.

**Rejection of Claims 8-9, 17-18 and 23-24 under 35 U.S.C. § 103(a)**

Claims 8-9, 17-18 and 23-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Veerasamy in view of U.S. Patent No. 6,343,216 to Kim. To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), the cited references must teach or suggest all the claim limitations. (MPEP § 2142). Applicants submits that the combination of Veerasamy and Kim does not teach or suggest a base station determining the call-drop location as in claims 1 and 21, from which claims 8-9 and 23-24 depend (claims 17-18 have been canceled).

Kim teaches a method of reconnecting a dropped call in a system. Kim does not teach determining the location of mobile stations, and thus does not teach a network-based mechanism for determining call-drop locations of mobile stations.

Since the combination of Veerasamy and Kim does not teach each claim limitation of claims 1 and 21, the combination does not obviate the invention recited in pending claims 9 and 23-24.

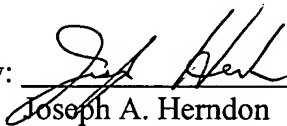
**Conclusion**

Applicants respectively submit that, in view of the remarks above, all of the pending claims are in condition for allowance. Applicants therefore respectfully request such action. The Examiner is invited to call the undersigned at (312) 913-3331 with any questions or comments.

Respectfully submitted,

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